

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**UNITED STATES OF AMERICA**

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**v.**

**CASE NUMBER: 3:23CR00497**

**JORGE GUADALUPE PALAFOX, JR.**

**DEFENDANT’S MOTION FOR CONTINUANCE OF PRE-TRIAL AND TRIAL DATES**

**TO THE HONORABLE UNITED STATES DISTRICT JUDGE:**

COMES NOW, Jorge Guadalupe Palafox, Jr., by and through his attorney of record,  
MARK A. PEREZ, would show the Court the following:

**I.**

This matter is set for Pre-Trial Conference on March 8, 2024, at 10:00 am.

Trial is scheduled for March 18, 2024, at 9:00 a.m.

**II.**

Additional time is needed to review discovery and the proposed plea agreements with Defendant, so that Defendant can make a fully-informed decision regarding the disposition of his case. Counsel for the Defendant and the Assistant United States Attorney are continuing their negotiations and anticipate a resolution that may not require a jury trial.

**III.**

This is the first request for continuance by the undersigned.

**IV.**

This Motion is not made for the purpose of delay, but so that justice may be served.

**WHEREFORE, PREMISES CONSIDERED**, Defendant, through Counsel, pray that the Court enter an order rescheduling the time for Final Pre-Trial Conference and Trial dates. Defendant requests at least a 30-day continuance.

RESPECTFULLY SUBMITTED,

/s/ MARK A. PEREZ

**MARK A. PEREZ**

**MARK PEREZ, P.C.**

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**ATTORNEY FOR DEFENDANT**

**JORGE GUADALUPE PALAFOX, JR.**

**CERTIFICATE OF CONFERENCE**

On the 12<sup>TH</sup> day of February 2024, the undersigned attempted to confer with Walter M. Junker, Assistant United States Attorney, but Mr. Junker has been unavailable to share his position on Defendant's Motion for Continuance.

/s/ Mark A. Perez  
**MARK A. PEREZ**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above foregoing motion was served upon all counsel of record by electronic filing on the 14<sup>th</sup> day of February 2024.

/s/ Mark A. Perez  
**MARK A. PEREZ**